

Elizabeth Roberge

From: Elizabeth Roberge
Sent: Wednesday, November 22, 2006 3:57 PM
To: 'delphi@skadden.com'
Subject: In re Delphi Corporation, et al.

Dear Counsel:

We are the attorneys for WorldWide Battery Company, LLC, a claimant in the above referenced bankruptcy proceeding (Ref. Claim No. 2479).

Please note that the deadline for filing a response to the Debtors' Third Omnibus Claims Objection was established as 4:00 p.m. on Friday, November 24, 2006, a legal holiday on which the Court and the Clerk's Office are closed in recognition of Thanksgiving.

We have spoken with the Clerk's Office, and have been advised that the mailroom will receive submissions on Friday, November 24th, which will then be processed on Monday, November 27th. We also have been advised that our filing, which is being submitted to the Court and served on all required parties via Federal Express for delivery by 10:30 a.m. on Friday, November 24th, will be file-marked as timely filed as of November 24th. The Court also has assured us that with respect to the "Chambers Copy" to be delivered to the Court, the submission will be considered timely filed.

In an abundance of caution, and in order to ensure that you receive your copy in advance of the Friday deadline, attached is a pdf copy of WorldWide's response to the Third Omnibus Claims Objection. (Concurrently with the filing of the response we also are seeking admission pro hac vice and privileges to utilize the Court's ECF system.) You also are being served with a hard-copy of the response via Federal Express, for delivery by November 24th at 10:30 a.m.

Please feel free to contact me with any questions.

Elizabeth A. Roberge
Roberge & Roberge
9190 Priority Way West Drive
Suite 100
Indianapolis, Indiana 46240
(317) 818-5500
(317) 818-5510 - Facsimile
eroberge@robergelaw.com

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